

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 5:23-CR-256
	:	
Plaintiff,	:	
	:	JUDGE BRIDGET MEEHAN BRENNAN
vs.	:	
	:	
KENNETH DWIGHT LINDSEY,	:	<u>UNOPPOSED MOTION TO CONTINUE</u>
	:	
Defendant.	:	

Defendant, through counsel, respectfully moves this Honorable Court for a 60-day continuance of the pretrial conference scheduled for June 27, 2023, and all other dates contained in the trial order. Additional time is needed to review discovery, meet with Mr. Lindsey, conduct any investigations, discuss plea negotiations, and possibly prepare for trial. Defense counsel has discussed this matter with Assistant U.S. Attorney Jennifer McLaughlin who advised the government has no objection to this request.

The request for this continuance is made in the interest of justice and not for needless delay. The interests of justice far outweigh the public's interest in a speedy trial and would best be served by granting this motion. See, 18 U.S.C. § 3161(h)(7)(A).

Having full and complete knowledge of the foregoing factors and the specific rights and requirements provided and set forth under Section 3161, Mr. Lindsey hereby moves this Honorable Court for a continuance for the trial date beyond the seventy (70) day limitation set forth in Title 18, Section 3161 *et seq.*

Respectfully submitted,

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/s/ Justin J. Roberts

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